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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-650

13 **SINCERAE CAMERON,**
14 **aka SINCERAE E. CAMERON**
15 **3244 N. Lorna**
16 **Fresno, CA 93705**

A C C U S A T I O N

Registered Nurse License No. 481060

Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 2. On or about August 31, 1992, the Board issued Registered Nurse License Number
23 481060 to Sincerae Cameron, also known as Sincerae E. Cameron ("Respondent"). Respondent's
24 registered nurse license was in full force and effect at all times relevant to the charges brought
25 herein and will expire on January 31, 2014, unless renewed.

26 **STATUTORY PROVISIONS**

27 3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that
28 the Board may discipline any licensee, including a licensee holding a temporary or an inactive

1 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing
2 Practice Act.

3 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not
4 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
5 to render a decision imposing discipline on the license. Under Code section 2811, subdivision
6 (b), the Board may renew an expired license at any time within eight years after the expiration.

7 5. Code section 2761, subdivision (a), states, in pertinent part, that the Board may take
8 disciplinary action against a certified or licensed nurse or deny an application for a certificate or
9 license for unprofessional conduct.

10 6. Code section 2762 states, in pertinent part:

11 In addition to other acts constituting unprofessional conduct within the
12 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a
13 person licensed under this chapter to do any of the following:

14 (b) Use any controlled substance as defined in Division 10 (commencing
15 with Section 11000) of the Health and Safety Code, or any dangerous drug or
16 dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or
17 in a manner dangerous or injurious to himself or herself, any other person, or the
18 public or to the extent that such use impairs his or her ability to conduct with safety to
19 the public the practice authorized by his or her license . . .

18 COST RECOVERY

19 7. Code section 125.3 provides, in pertinent part, that the Board may request the
20 administrative law judge to direct a licentiate found to have committed a violation or violations of
21 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
22 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
23 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
24 included in a stipulated settlement.

25 CONTROLLED SUBSTANCES

26 8. "Vicodin" is a compound consisting of 5 mg hydrocodone bitartrate, also known as
27 dihydrocodeinone, and 500 mg acetaminophen per tablet, and is a Schedule III controlled
28 substance as designated by Health and Safety Code section 11056, subdivision (e)(4).

1 CAUSE FOR DISCIPLINE

2 (Impairment While on Duty)

3 9. Respondent is subject to disciplinary action pursuant to Code section 2761,
4 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,
5 subdivision (b), in that while employed and on duty as a psychiatric registered nurse in the
6 Inpatient Psychiatry Unit, 6 East (also a chemical dependency unit), at the Veterans Affairs
7 ("VA") Hospital located in Fresno, California, Respondent used controlled substances, including,
8 but not limited to, Vicodin, to an extent or in a manner dangerous or injurious to herself and
9 others or to the extent that such use impaired her ability to conduct her nursing duties safely, as
10 follows:

11 a. On several occasions between 2004 and June 2011, Respondent was observed by VA
12 staff to be under the influence of drugs or narcotics and to have objective symptoms of
13 impairment, including slurred speech, difficulty focusing, unsteady gait or equilibrium, impaired
14 judgment or cognitive impairment, sleeping while on duty, and unresponsiveness. On one
15 occasion, VA staff nurses observed Respondent in the Nurses' Lounge pulling up her blouse and
16 exposing her breasts to E. T., another staff nurse. Further, Respondent's nurse manager sent her
17 home on at least three occasions due to her impairment while on duty.

18 b. On December 29, 2011, during her interview with Special Investigators of the Board,
19 Respondent stated that in approximately 2006, she began taking Vicodin for her back pain and
20 developed a prescription drug problem. Respondent also stated that she had been addicted to
21 drugs ever since she was 20 years old.

22 PRAYER

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Board of Registered Nursing issue a decision:

25 1. Revoking or suspending Registered Nurse License Number 481060, issued to
26 Sincerae Cameron, also known as Sincerae E. Cameron;

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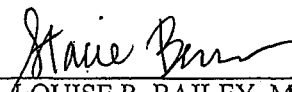
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1 2. Ordering Sincerae Cameron, also known as Sincerae E. Cameron, to pay the Board of
2 Registered Nursing the reasonable costs of the investigation and enforcement of this case,
3 pursuant to Business and Professions Code section 125.3;

4 3. Taking such other and further action as deemed necessary and proper.

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6 DATED:

February 21, 2013

for 

LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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